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October 18, 2022

## **VIA ECF**

The Honorable Victor Marrero United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: United States v. Pedro Mejia 22 Cr. 144 (VM)

Dear Judge Marrero:

Please recall that I represent Mr. Pedro Mejia in his defense of the above-referenced matter. I write to request a change in Mr. Mejia's current bond conditions to remove the conditions of a curfew and electronic monitoring.

On December 8, 2021, Magistrate Judge James L. Cott ordered Mr. Mejia's release on a \$100,000 personal recognizance bond co-signed by three suretors. Pursuant to the conditions of the bond, Mr. Mejia is presently subject to the condition of home detention except for employment purposes and other pre-approved activities, and his travel is restricted to the Southern and Eastern Districts of New York. He surrendered all travel documents and has not made and will not make any applications for new travel documents. On July 1, 2022, Your Honor granted the defense's request to modify Mr. Mejia's bond conditions to remove the condition of home detention and impose a curfew to be determined by United States Pretrial Services.

On October 11, 2022, I was contacted by United States Pretrial Services ("Pretrial") Officer Ashley L. Cosme, who indicated that Pretrial was recommending that Mr. Mejia request a modification of his bond conditions to remove the conditions of a curfew and electronic monitoring. Officer Cosme made this recommendation based on Mr. Mejia's complete compliance with his bail conditions to date and continued employment. We consulted with A.U.S.A. Thomas Burnett regarding the proposed modification, and the Government defers to Pretrial.

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Therefore, I respectfully request that Your Honor modify Mr. Mejia's bond conditions to remove the conditions of a curfew and electronic monitoring. Thank you for your consideration of this request.

Respectfully submitted,

Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Thomas Burnett (via ECF)

U.S.P.T.S.O. Ashley L. Cosme (via email)

Mr. Pedro Mejia (via email)

